

Christopher Williams

From: Christopher Williams
Sent: Wednesday, July 31, 2024 3:33 PM
To: 'Katherine Lamb'
Cc: Whitney Woodward; Andrew Worseck
Subject: Chicago Alliance against Racist and Political Repression, et al. v. City of Chicago, et al, No. 24-cv-2347
Attachments: Plaintiffs v City Position.docx

Counsel,

In the interest of clarity and limiting the issues in dispute, I wanted to see if we could share our respective positions about the parade permits that are at issue in this case.

The City, through CDOT, initially issued a formal denial of the original parade permits for my four clients, CAARPR, AWC, SDS at UIC and USPCN and, in the case of the first three, initially offered an alternative on Columbus Drive in Grant Park. In the course of this litigation, the City offered via an email and, in the case of USPCN's parade permit application, through CDOT, the route referenced in the City's response brief (ECF No. 32-1, page 11 of 49). While the Plaintiffs contest certain aspects of the City's offered alternate route, the City's proposed alternate route is clear. However, there are other aspects of the permit requests that are not clear and we would like to see if there are any disputes as to those aspects.

I have attached a chart of some of those issues and would ask that you provide the City's position as to each so that we will know whether we need to address them or not. If you would prefer to have a discussion by phone, please let me know. I am happy to do that.

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